

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

- - - - -x  
STALIN RODRIGO REYES ESPINOZA,  
Plaintiff,

-against-  
DAVS PARTNERS LLC AND KALNITECH  
CONSTRUCTION COMPANY,

Defendants.

- - - - -x  
Veritext Virtual

November 17, 2021  
12:11 p.m.

EXAMINATION BEFORE TRIAL of STALIN  
RODRIGO REYES ESPINOZA, the Plaintiff in  
the above-entitled action, held at the  
above time and place, taken before Carol  
Ellinghaus, a Notary Public of the State  
of New York, pursuant to an Order and  
stipulations between Counsel.

\* \* \*

1  
2 APPEARANCES:

3 GORAYEB & ASSOCIATES, PC  
Attorneys for Plaintiff  
4 100 William Street, Ste. 1900  
New York, New York 10039

5  
6 BY: JARED TURCO, ESQ.

7 RICHMAN & LEVINE, PC  
Attorneys for Defendant  
8 Dava Partners, LLC  
666 Old Country Road  
9 Garden City, New York 11530

10 BY: KETH RICHMAN, ESQ.

11  
12 LAW OFFICE OF MICHAEL SWIMMER  
Attorneys for Defendant  
13 Kalnitech Construction Company  
605 3rd Avenue, 9th Floor  
14 New York, New York 10158

15 BY: ROBERT BRIGANTIC, ESQ.

16 ALSO PRESENT: Daniel Rodriguez,  
Spanish Interpreter  
17 Nora Youmans,  
Spanish Interpreter

18 \* \* \*

19  
20  
21  
22  
23  
24  
25

1 S. Espinoza

2 Q. Prior to lunch, we were talking  
3 about your second job while you were  
4 living in the United States of putting  
5 metals or columns for interior walls.

6 You said you started in or about  
7 January of 2019 and worked there for two  
8 months; correct?

9 A. Yes.

10 Q. What was the reason you left  
11 that job?

12 A. Because they didn't have any  
13 jobs.

14 Q. What was your next job?

15 A. Working with this gentleman.

16 Q. Working with what gentleman?

17 A. With the company. The company.

18 Q. We are talking about Jim  
19 Associates?

20 A. Yes.

21 Q. When did you start working for  
22 Jim Associates, what month?

23 A. Approximately in May.

24 Q. Of what year?

25 A. 2019.